

**VICTIMS OF CRIME ACT (VOCA)
CRIME VICTIM ASSISTANCE
GRANT UNIT**

**FUNDING RECOMMENDATIONS AND DENIAL APPEALS
POLICIES AND PROCEDURES**

Effective Upon Issuance



Rick Snyder, Governor
Nick Lyon, Director

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Provider

**MICHIGAN DEPARTMENT OF HEALTH AND HUMAN
SERVICES
CRIME VICTIMS SERVICES COMMISSION
VICTIMS OF CRIME ACT
CRIME VICTIM ASSISTANCE GRANT PROGRAM
320 S. Walnut Street
Lewis Cass Building
Lansing, Michigan 48913
517 241-5249**

**THIS DOCUMENT SHOULD BE RETAINED ALONG WITH
PERMANENT AGENCY VOCA GRANT RECORDS.
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**VICTIMS OF CRIME ACT VICTIM
ASSISTANCE GRANT UNIT
POLICIES AND PROCEDURES**

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1.0 FUNDING RECOMMENDATIONS

1.1 AREAS OF CONSIDERATION FOR FUNDING RECOMMENDATIONS

- A. In developing a standardized, fair and impartial process of reviewing, evaluating and making funding recommendations for grant applications, the CVSC will include but not be limited to the following areas of consideration: eligibility and priorities established by the federal legislation and program

guidelines, special needs of underserved victim populations, priority areas for funding, geographic distribution of funds, crime rates, baseline and capacity of existing victim services, avoidance of duplication of services, ethnic and cultural needs, coordination with other agencies and funding sources, financial, administrative and programmatic capacity of the applicant to provide the necessary services, and any other current CVSC funding priorities. The CVSC reviews the application to make sure that the information presented is reasonable, understandable, measurable, and achievable, as well as consistent with program or legislative requirements as stated in the solicitation.

1.2 CVSC CONFLICT OF INTEREST POLICY

- A. A conflict of interest for department staff and reviewers includes:
1. Having a financial interest in the funding of an applicant organization;
 2. Having a blood relative, spouse or partner affiliated with an applicant organization or project; and
 3. Having served at any time during the past three years as an employee, volunteer, paid consultant or governing board member of an applicant organization.
 4. Any reviewer whose affiliation constitutes a conflict of interest shall be excluded from all aspects of review and recommendation concerning their own grant proposals in the corresponding competitive category.
 5. Any staff member with a conflict of interest may not take part in the overall review process and may not rate or take part in discussions about funding for the program for which they have a conflict of interest.

1.3 WRITTEN RECORD OF GRANT REVIEW PROCESS

- A. The CVSC VOCA staff shall create a written record of the grant review process by completing score sheets or other written evaluation instruments. Such written evaluations shall be a factor in the funding recommendation, but shall not supersede a consideration of all pertinent factors, such as those listed in 1.1 A. above.
- B. Peer reviewers will be reviewing the applications submitted. CVSC may use either internal peer reviewers, external peer reviewers or a combination of both to review the applications. An external peer reviewer is a subject matter expert (SME) of a given solicitation who is not a current State of Michigan employee. An internal reviewer is a subject matter expert of a given solicitation who is a current State of Michigan employee. Applications will be screened initially to determine whether the applicant meets all eligibility requirements. Only applications submitted by eligible applicants that meet all other requirements (such as timeliness, proper format, required attachments, and responsiveness to the scope of the solicitation) will be evaluated, scored, and rated by a peer review panel. Peer reviewers' ratings and any resulting

recommendations are advisory only. In addition to peer review ratings, considerations may include, but are not limited to, underserved populations, strategic priorities, past performance, and available funding.

- C. The CVSC VOCA Program Specialist shall make a funding recommendation on each application, the written record of which shall be preserved in the grant file.

1.4 SUPPLEMENTAL INFORMATION

- A. The CVSC VOCA Program Specialist may request an applicant to make an oral presentation or respond in writing to questions if additional information is needed prior to making a funding recommendation.

1.5 DISCUSSION OF FUNDING RECOMMENDATIONS

- A. The CVSC staff shall not discuss funding recommendations with applicants until after all appeals are exhausted and recommendations of the CVSC Director are finalized.

1.6 WRITTEN DOCUMENTATION OF REASONS FOR DENIAL

- A. Whenever the CVSC VOCA Program Specialist denies funding to any agency submitting an application for Victims of Crime Act (VOCA) Assistance funds, the specific reasons for the denial shall be listed in the denial letter and made part of the grant file.

SECTION 2.0 APPEAL OF FUNDING RECOMMENDATIONS

2.1 NOTIFICATION OF RIGHT OF APPEAL

- A. The CVSC VOCA Program Specialist shall give notification to an agency of the denial of funding and the specific reasons for the denial, not less than five working days prior to the deadline date for an appeal. CVSC VOCA Program Specialist shall confirm and record the applicant's receipt of notification.
- B. The CVSC VOCA Program Specialist shall advise the agency of the appeal procedure and deadline for appeal in writing.

2.2 CONDITIONS OF APPEAL FOR RECONSIDERATION

- A. An applicant agency for which the CVSC VOCA Program Specialist recommends no funding shall have the right to appeal for reconsideration by the CVSC Director. The appeal letter should be addressed to:

James McCurtis, Director
Crime Victims Services Commission
Lewis Cass Building
320 South Walnut Street
Lansing, MI 48913

- B. The signed and dated appeal letter should be scanned as a PDF document and sent to Leslie O'Reilly, VOCA Program Specialist via electronic mail at OREILLYL@michigan.gov. Questions regarding the appeal letter may be directed to her attention at 517 241-5249.
- C. The right of appeal does not extend to reductions in funding requests.
- D. Agencies submitting appeals must submit a written appeal to the CVSC Director by the deadline set for appeals in the annual Notice of Funding.
- E. Appeals submitted after the deadline will not be heard.
- F. The appeal is limited to disagreement with the reasons for which the denial of funding was made, and/or the provision of new information. New information must be something not available at the time of application. Information that was required that could have been provided but was not at time of application is insufficient reason for an appeal.
- G. The CVSC Director may impose such time limits during discussion on appeals as s/he deems necessary.

2.3 PROCESS TO APPEAL FUNDING RECOMMENDATION

Applicants may request a reconsideration of a funding decision by the VOCA Program Specialist through the following process.

- A. A letter shall be sent by the Program Specialist to all applicants notifying them of the outcome of the funding decisions. Within 7 days of the date of the letter, the applicant shall submit a written request for reconsideration of the decision.
- B. Written requests must state the grounds for reconsideration (see "Reasons for Requesting a Reconsideration") and describe in detail the justification for the request.
- C. Within 7 days of receipt of the written request for reconsideration, the Director will review the request and send a written response to the grantee or applicant. The written response will indicate how the issue has been resolved (see "D" below) or what steps will be taken to achieve resolution. If further steps or actions are to be taken, the response will include timelines for final resolution. The Director may take any of the following actions to gather sufficient information to make a final determination.
 - 1. Direct Program Specialist to investigate the applicant's request and provide him/her with additional information.
 - 2. Request that the applicant meet with the Director and/or Program Specialist to discuss issues raised in the written request for reconsideration.
- D. The final written notification from the CVSC Director shall inform applicant(s) of the appeal. The possible outcomes are:
 - 1. A determination that the applicant did not appeal the decision within the established timeline (see "A" above) and find against the applicant.
 - 2. A determination that the applicant did not show sufficient cause for the reconsideration (as outlined under "Reasons for Requesting a Reconsideration") and find against the applicant.

3. A determination that the applicant does show sufficient cause for reconsideration (as outlined under "Reasons for Requesting Reconsideration"). If sufficient cause is found, the CVSC Director may instruct the CVSC Program Specialist to:
 4. Reopen the applicant process;
 5. Initiate a new review process;
 6. Reconvene the peer review panel that made the recommendation for the purpose of reconsidering all proposals from the point where a procedural error occurred; or
 7. Provide funding for the applicant's proposed project.
- E. The decision of the CVSC Director is final.

2.4 REASONS FOR REQUESTING RECONSIDERATION

The Director of the CVSC, taking into consideration the recommendations of the VOCA Program Specialist, will make final decisions concerning appeal of grant awards. Grounds to appeal funding denial of the Director are as follows:

- A. A procedural error occurred during the application process.

Inaccuracies or other errors occurred in the announcement of the Notice of Funds, VOCA Grant applications and/or applicant materials that resulted in an unfair advantage/disadvantage to a specific applicant(s).
- B. Procedural error occurred during the review process.

The review process did not follow the policies established by the CVSC to ensure fair and unbiased decision making. Those policies are:

 1. Reviewers must read and rate all proposals in order to participate in the review;
 2. Reviewers must complete their rating forms prior to the review sessions;
 3. Proposals must be rated and reviewed based on the criteria for funding and other requirements as stated in the grant application;
 4. Reviewers must participate in the entire review session;
 5. A minimum of three reviewers must participate in the review; and,
 6. Reviewers must be free of conflict of interest as defined by department policy (see Section 1.2).

SECTION 3.0 FINAL RECOMMENDATIONS FOR FUNDING

3.1 RECOMMENDATIONS FOR FUNDING

- A. After any appeals for reconsideration are exhausted, the CVSC VOCA Program Specialist shall make final recommendations in consultation with the CVSC Director for funding to the State Administrative Board.
- B. The decision made by the CVSC VOCA Program Specialist, considering the recommendations of internal and external reviewers, and agreed to by the State Administrative Board and signed by an official of the Michigan Department of Health and Human Services shall be final.

